



August 5, 2005

VIA ELECTRONIC MAIL

Federal Communications Commission
Strategic Plan Comments
Timothy A. Peterson
445 12th Street, S.W., Room 7-C410
Washington, DC 20554

**Re: Comments of TerreStar Networks Inc. to the
FCC's Draft Strategic Plan**

Dear Mr. Peterson:

As President and Chief Executive Officer of TerreStar Networks Inc. ("TerreStar"), I am writing to express TerreStar's enthusiastic support for the goals announced in the Commission's draft strategic plan. With its affiliate, TMI Communications and Company Limited Partnership ("TMI"), TerreStar is developing and building an innovative satellite/terrestrial mobile satellite service ("MSS") with ancillary terrestrial component ("ATC") in the 2 GHz frequency band.¹ This system, which will include one of the most powerful mobile satellites ever deployed, will contribute uniquely to the Commission's ability to realize four crucial goals set out by the strategic plan -- promoting broadband availability, competition in the provision of communications services, spectrum efficiency, and public safety and homeland security infrastructure.

Public Safety and Homeland Security. One of the most important of the strategic plan's goals is to enable the development of communications systems that are ubiquitous across the nation, fully redundant and reliable, interoperable and have sufficient capacity to carry critical communications services for public safety, homeland security and national defense. The only communications networks that fulfill this goal completely are hybrid satellite/terrestrial systems, which will permit emergency responders and homeland security end users to have seamless communications using the same low-cost, broadband-capable device in any emergency anywhere in the country. TerreStar is thus committed to continue to work actively with emergency responders, homeland security entities and private companies to explore fully the advanced national

¹ TerreStar is the prospective assignee of TMI's 2 GHz MSS authorization and, pursuant to an agreement with TMI, has contracted with Space Systems/Loral Inc. for a satellite that will operate in this band.

security, homeland defense and public safety applications that can only reasonably be done through a robust, next generation hybrid satellite/terrestrial network. It also has extensively documented to the Commission the need for a spectrum assignment of 2 x 10 MHz to ensure that first responders and other public safety officials receive the full benefits of the 2 GHz MSS/ATC service.²

Spectrum. The Commission has long recognized, and again reiterates in the strategic plan, its commitment to “improve the efficiency and effectiveness of spectrum use” (Strategic Plan, 11). TerreStar understands the importance of making efficient use of the vital spectrum resource, and has designed the TerreStar system to efficiently use just 2 x 10 MHz of spectrum to work with state-of-the-art 3G and 4G wireless technologies, provide 2 Mbps – and potentially greater – wireless packet data rates, and provide a robust system that offers a user experience that is similar in features, size and cost to today’s cellular/PCS services.

Broadband. TerreStar agrees with the strategic plan that “[b]roadband empowers by providing increased access to information and applications, and increasingly affordable means to communicate within communities and around the world” (Strategic Plan, 6). As the strategic plan also recognizes, it is essential that *all* Americans, whether they live in the largest urban center or the most remote rural dwelling, should have access to broadband services. To further this goal, TerreStar is building the largest and most sophisticated commercial mobile satellite ever, enabling the delivery of affordable but high-speed mobile data applications in all areas of the country, no matter how remote.

Competition. As an emerging competitor in the consumer market for mobile telecommunications services, TerreStar supports the strategic plan’s goal of “implement[ing] and enforce[ing] policies that ensure that U.S. consumers benefit from competition in domestic and global services” (Strategic Plan, 9). The competitive thrust of the 2 GHz MSS/ATC service could be particularly important in rural areas, where consumers have access to far less mobile (or fixed) communications providers than do their counterparts in more densely populated areas.³ TMI/TerreStar is prepared to provide truly ubiquitous high-speed data and voice coverage from the moment its system begins commercial service.

² See, e.g., Comments of TMI and TerreStar, WT Docket No. 05-221, at 16-20 (filed July 29, 2005).

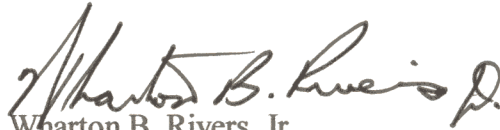
³ See, e.g., *Annual Report and Analysis of Competitive Market Conditions With Respect to Commercial Mobile Services*, 19 FCC Rcd. 20597, 20643 ¶ 109 (2004).

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TerreStar applauds the Commission for announcing as principal objectives the improvement of public safety and homeland security communications, promotion of efficient use of spectrum, widespread availability of broadband access, and a competitive marketplace for communications services. TerreStar looks forward to working with the Commission to ensure that the 2 GHz MSS/ATC service advances these important goals.

Sincerely,

A handwritten signature in black ink, appearing to read "Wharton B. Rivers, Jr.", with a stylized flourish at the end.

Wharton B. Rivers, Jr.

President and CEO

TerreStar Networks Inc.